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Attorneys for Defendant

6 State Farm Mutual Automobile Insurance Company

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 **CHARLES KEENAN, Individually;**  
11 **TAMMY KEENAN, individually;**

12 Plaintiff,

13 v.

14 **STATE FARM MUTUAL AUTOMOBILE**  
15 **INSURANCE COMPANY; DOES I-X,**  
16 **and ROE CORPORATIONS I-X,**  
17 **inclusive**

18 Defendant

2:17-cv-01999-RFB-VCF

\*SUBMITTED IN COMPLIANCE  
WITH LR 26-1(e) \*

19 **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES**  
20 **(SECOND REQUEST)**

21 Pursuant to Local Rules 6-1 and 26-4, the parties, by and  
22 through their respective counsel of record, hereby stipulate to  
23 and request that the Court extend the deadlines by sixty days.

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**A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED:**

The following discovery has been completed by the parties:

1. Defendant's Initial Disclosure, pursuant to FRCP 26(f);
2. Plaintiff's Initial Disclosure, pursuant to FRCP 26(f);
3. Defendant's First Supplemental Initial Disclosure, pursuant to FRCP 26(f);
4. Defendant's First Set of Request for Admissions to Plaintiff, Charles Keenan;
5. Defendant's First Set of Request for Admissions to Plaintiff, Tammy Keenan;
6. Plaintiff's Requests for Admissions to Defendant;
7. Plaintiff, Charles Keenan, Responses to Defendant's Requests for Admissions;
8. Plaintiff, Tammy Keenan, Responses to Defendant's Requests for Admissions;
9. Defendant's Responses to Plaintiff's Requests for Admissions;
10. Plaintiff's Interrogatories to Defendant;
11. Defendant's Interrogatories to Plaintiff, Charles Keenan;
12. Defendant's Interrogatories to Plaintiff, Tammy Keenan;

13. Plaintiff, Charles Keenan, Responses to Defendant's Interrogatories;
14. Plaintiff, Tammy Keenan, Responses to Defendant's Interrogatories;
15. Defendant's Responses to Plaintiff's Interrogatories;
16. Defendant's Request for Production of Documents to Plaintiff, Charles Keenan;
17. Defendant's Request for Production of Documents to Plaintiff, Tammy Keenan;
18. Plaintiff's Request for Production of Documents to Defendant;
19. Plaintiff, Charles Keenan, Responses to Defendant's Request for Production of Documents;
20. Plaintiff, Tammy Keenan, Responses to Defendant's Request for Production of Documents;
21. Defendant's Responses to Plaintiff's Request for Production of Documents;
22. Deposition of Plaintiff, Charles Keenan;
23. Deposition of Plaintiff, Tammy Keenan;
24. Disclosures of Plaintiff and Defendant's experts;

**B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE COMPLETED:**

1. Depositions of Dr. Rosler, Dr. Gabroy, Dr. Sorelle and Dr. Germin from Plaintiff's medical providers relevant

to treatment rendered to Plaintiff since the date of  
this accident;

2. The depositions of Defendants 30(b)(6) witness, Holly  
Spinks and Craig Falvo of State Farm .

**C. THE REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED  
WITHIN THE TIME LIMITS SET BY THE DISCOVERY ORDER:**

Both parties have been working diligently to move this  
matter forward. At this time both parties are requesting are  
requesting an additional sixty days to depose the remaining  
medical experts and State Farm employees. Both parties believe  
that the additional time will allow the parties to schedule the  
remaining depositions. Further, the parties believe that this  
will better position the parties for a potential settlement  
conference and early resolution of this dispute.

**D. A PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING  
DISCOVERY:**

	<b>Old Deadline</b>	<b>New Deadline</b>
Discovery Cut off:	04/20/2018	06/20/2018
Amending Pleadings & Adding Parties:	11/21/17	CLOSED
Expert Disclosure:	2/09/2018	CLOSED
Rebuttal of Experts:	03/21/2018	CLOSED
Interim Status Report:	2/19/2018	CLOSED
Dispositive Motions:	05/21/2018	07/21/2018
Joint Pretrial Order		08/21/2018

If dispositive motions are filed, the deadline for filing the joint pretrial order  
will be suspended until 30 days after decision on the dispositive motions or  
further court order.

1 SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY  
2 DELAYING DISCOVERY OR THE TRIAL OF THIS MATTER.

3 Dated: April 16, 2018

Dated: April 16, 2018

4 RANALLI ZANIEL FOWLER & MORAN

GLEN LERNER INJURY ATTORNEYS

5  
6 /s/ BENJAMIN CARMAN  
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Attorney for Plaintiffs,  
Charles Keenan and  
Tammy Keenan

12  
13  
14 ORDER

15 IT IS SO ORDERED:

16 4-24-2018

17 Dated: \_\_\_\_\_

18 

19 \_\_\_\_\_  
20 UNITED STATES MAGISTRATE JUDGE  
21  
22  
23  
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